

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TAWAINNA ANDERSON,  
Individually and as Administratrix  
of the ESTATE OF NYLAH  
ANDERSON, a deceased minor

*Plaintiff,*

v.

TIKTOK, INC. AND  
BYTEDANCE, INC.

*Defendants.*

No. 2:22-cv-01849-PD

**PLAINTIFF’S MOTION FOR LEAVE TO AMEND COMPLAINT**

Plaintiff, Tawainna Anderson, Individually and as Administratrix of the Estate of Nylah Anderson, a deceased minor (“Plaintiff”) respectfully moves for leave to amend her Complaint. The purpose of the amendment is to remove dicta that is inconsequential to Plaintiff’s claims against Defendants TikTok, Inc. and ByteDance, Inc. (“TikTok”) and to make clear that Plaintiff’s claims against TikTok are not premised upon addiction. The Amended Complaint Plaintiff now seeks to file adds no new claims or factual allegations and only clarifies the narrow scope of Plaintiff’s claims. Plaintiff’s proposed Amended Complaint is attached hereto as **Exhibit A**, and a redlined copy clearly identifying the amendments is attached hereto as **Exhibit B**.

For the reasons set forth in detail in the attached Memorandum of Law, which is incorporated herein by reference, Plaintiff respectfully requests that this Court grant Plaintiff leave to file the attached Amended Complaint.

Dated: October 17, 2022

Respectfully submitted,

/s/ Jeffrey P. Goodman

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 17, 2022, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Jeffrey P. Goodman